

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

IN RE:)	Case No. 19-22776-GLT
)	
Shawn W. Deffner)	Chapter 13
Debtor(s))	
)	Doc. No.:
)	
Shawn W. Deffner)	
Movant (s))	
)	
v.)	
)	
Ronda J. Winnecour, Trustee)	
Respondent)	

NOTICE OF CONVERSION FROM CHAPTER 13 TO CHAPTER 7
FILED PURSUANT TO FED. RULE BANKR. PROC. 1017(f) (3)

AND NOW COMES, the Debtor, by and through attorney, Albert G. Reese, Jr. and the Law Office of Albert G. Reese, Jr., and files the within Notice of Conversion from Chapter 13 to Chapter 7 pursuant to Federal Rule of Bankruptcy Procedure 1017(f)(3) for the following reasons:

Debtor filed the instant case to save his home. The Debtor has made his best efforts to fund the current Chapter 13 Plan. The Debtor is employed as a Mortgage Specialist with Reliance First Capital LLC and is paid on a commission basis. The Debtor has experience a substantial loss of income over the last several months as a result of the rising interest rates for home purchase and refinance. As a result, it would be a financial hardship for the Debtor to continue to fund his pending Chapter 13 Case. As a result, the Debtor desires to convert his case to one under Chapter 7 and receive a fresh start.

Date: **January 23, 2023**

Respectfully submitted by:
/s/ Albert G. Reese, Jr., Esquire
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